

1 **GERALD M. COBB (SBN: 44702)**
2 **16633 Ventura Boulevard**
3 **Suite 500**
4 **Encino, California 91436**
5 **(818) 990-9710**

6
7
8 **Attorney for Defendant**
9 **MARCUS RANDALL**

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARCUS RANDALL,

Defendant

CASE NO.: 1:21-CR-00129-JLT-SKO

STIPULATION TO CONTINUE
SENTENCING AND ORDER
THEREON

DATE : August 7, 2023

TIME : 10:00 a.m.

COURT: Hon. Jennifer L. Thurston

STIPULATION

Plaintiff UNITED STATES OF AMERICA, by and through its counsel of record JUSTIN J. GILIO, and defendant, by and through defendant's counsel of record GERALD M. COBB, hereby stipulate as follows:

1. By previous order, this matter was set for sentencing on August 7, 2023 at 10:00 a.m..

2. By this stipulation, defendant now moves to continue the sentencing until September 18, 2023 at 10:00 a.m.

3. The parties agree and stipulate, and request that the Court find the following:

a) Counsel for defendant desires additional time to consult with his client about

1 particular factual contentions and conclusions to be drawn therefrom which are contained in
2 the government's sentencing memorandum filed July 31, 2023. This would require meeting
3 with the client at the Lerdo Pre-trial detention facility and jointly reviewing some of the
4 government's exhibits which were made part of it's sentencing memorandum.

5 b) Counsel for defendant needs additional time to receive and properly present to
6 U.S. Probation Officer JESSE MORA letters written on behalf of the defendant.

7 c) Counsel for defendant believes that failure to grant the above-requested
8 continuance would deny him the reasonable time necessary for effective preparation for
9 sentencing.

10 d) The government does not object to the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the
12 case as requested. Defense counsel to file sentencing memorandum by September 11, 2023.

13 IT IS SO STIPULATED.
14

15 DATED: August 2, 2023

PHILLIP A. TALBERT
United States Attorney

Justin J. Gilio

JUSTIN J. GILIO
Assistant United States Attorney

21 DATED: August 2, 2023

Gerald M. Cobb

GERALD COBB
Counsel for Defendant
MARCUS RANDALL

24 ORDER
25 IT IS SO ORDERED

26 DATED: August 4, 2023

Jennifer L. Thurston
HON. JENNIFER L. THURSTON